



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 7, 2021

BY EMAIL

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)*

Dear Judge Nathan:

The parties respectfully submit this joint letter to provide the Court with the parties' respective positions regarding juror questionnaires completed on November 5, 2021 and November 6, 2021.

I. Prospective Jurors Proceeding to Voir Dire

The parties agree that the following prospective jurors should proceed to voir dire:

Juror #
2
7
8
12
13
14
20
21
22
23
26
27
28
29
30

Page 2

32
33
37
43
47
48
49
50
54
55
58
62
63
70
79
82
87
89
93
96
98
108
112
113
114
117
119
120
123
124
125
126
129
131
132
147
149
151
152
153
162
164

166
167
169
170
172
174
176
181
182
186
188
189
195
196
198
199
200
204
206
207
215
216
220
226
228
235
239
240
241
248
251
257
260
261
263
270
271
273
275
277
279
280

282
286
290
292
297
299
304
311
312
313
314
315
326
334
338
340
341
345
347
349
354
363
366
367
372
374
378
379
384
385
387
388
391
394
396
398
403
404
407
409
411
413

418
419
420
422
424
425
426
428
429
430
432
433
434
437
439
440
442
444
445
450
451
452
456
457
459
460
461
465
467
475
477
480
481
485
486
487
489
498
501
504
505
506

509
514
516
517
520
541
542
543
544
545
549
551
555
556
561
562
563
565
566

II. Prospective Jurors Excused

The parties agree that the following jurors should be excused:

Juror #
1
5
6
18
24
25
31
35
40
41
45
46
52
57
59
60

Page 7

61
64
65
69
72
75
77
78
80
81
83
84
86
88
95
97
99
100
101
103
104
106
107
110
115
116
118
121
127
128
130
133
134
135
136
137
138
139
142
143
144
146

148
150
154
155
156
157
158
159
161
163
165
171
173
177
185
187
190
191
192
193
201
202
203
205
208
210
214
218
221
231
232
234
237
242
243
244
245
246
247
249
250
252

Page 9

253
255
256
259
262
264
265
266
267
268
269
276
281
284
285
287
288
289
291
293
296
300
301
302
303
306
307
309
310
317
318
321
322
323
324
325
327
329
330
332
333
337

348
352
353
355
358
359
360
361
364
365
368
370
371
373
375
380
381
382
383
386
389
390
392
393
395
397
399
400
401
402
408
410
412
414
416
417
423
427
431
436
441
443

446
447
449
453
455
458
462
463
464
468
469
470
471
472
473
476
478
479
483
490
492
493
495
496
497
500
502
503
507
508
512
513
515
518
519
522
523
524
525
526
527
528

530
533
534
535
536
537
539
540
546
550
552
554
557
558
559
560
564

III. Defense Objections

The following is a list of prospective jurors that the defense but not the Government believes should be excused:

Juror #
3
4
9
10
11
15
16
17
19
36
38
39
51
53
56
66
67

68
71
73
74
76
85
90
91
92
94
102
105
109
111
122
140
141
145
160
168
178
179
180
183
184
194
197
209
211
213
217
219
222
223
224
225
227
229
230
233
236
238

254
258
272
274
283
294
298
308
316
319
320
328
331
335
336
342
343
344
350
356
357
362
369
376
377
405
406
415
421
482
484
499
510
511
521
529
532
547
548
553

IV. Government Objections

The following is a list of prospective jurors that the Government but not the defense believes should be excused:

Juror #
34
42
44
175
212
278
295
305
339
346
351
435
438
448
454
466
474
488
491
494
531
538

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: s/
Alison Moe
Lara Pomerantz
Andrew Rohrbach
Assistant United States Attorneys
Southern District of New York

Cc: Defense Counsel (By email)